

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

STACY PLUMLEE,	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No. 16-00902-RGA
	:	
CONNECTIONS COMMUNITY SUPPORT	:	
PROGRAMS, INC., MICHELLE MURTHA,	:	
individually, DANIELLE HOLDER,	:	
individually, CINDY JOHNSON,	:	
individually, LESLIE DONOHUE, D.O.,	:	
individually, OFFICER JAVONNE PAYNE,	:	
individually, and officially, CORPORAL	:	
MARK THOMAS, individually and	:	
officially, DEPARTMENT OF SAFETY	:	
AND HOMELAND SECURITY-	:	
DIVISION OF STATE POLICE, and STATE	:	
OF DELAWARE,	:	
Defendants.	:	

**FIRST REQUEST FOR PRODUCTION BY STATE DEFENDANTS
DIRECTED TO PLAINTIFFS**

State Defendants Corporal Mark Thomas, Department of Safety and Homeland Security-Division of State Police, and State of Delaware hereby request that Plaintiff produce at Staqte Defendants' attorneys' office for the purpose of inspection and copying, all of the following documents or evidence within thirty (30) days pursuant to Fed. R. Civ. P. 34. These requests for production are continuing and the items requested must be kept current by supplementation.

As used in this request for production, "you" or "yours" means and refers to plaintiff, his attorney(s) and their agents and employees.

State Defendants request that Plaintiff produce complete originals of the following:

1. Any and all documents and tangible things referred to in plaintiff's complaint in this matter.

2. Any and all documents and tangible things identified or that should be identified in response to requesting State defendants' interrogatories.
3. Any and all statements, in writing or oral, by any party or witness, in any form, relating to the incidents that form the basis of this lawsuit.
4. Any and all videotapes, audiotapes, or photographs taken by you that refer or relate to any claim or defense in the present matter.
5. Any and all medical records or reports regarding the examination or treatment of plaintiffs.
6. Any and all documents or physical evidence that supports any claim of Plaintiffs' for damages of any nature.
7. Any investigative reports prepared by plaintiffs' regarding this case.
8. Any document in your possession that pertains to any defendant.
10. Any and all records that support your claims that plaintiff suffered injuries from handcuffing by Corporal Thomas.

STATE OF DELAWARE
DEPARTMENT OF JUSTICE
/s/ Michael F. McTaggart
Michael F. McTaggart (#2682)
Deputy Attorney General
820 North French Street, 6th Floor
Wilmington, DE 19801
(302) 577-8400
Attorney for State Defendants

DATED: December 11, 2017